

# Exhibit A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

SIEW V. THONG, YUE F. XIA, QIAO F. CHEN,

Plaintiffs,

v.

LOVELY NAILS NY, INC. d/b/a "Lovely Nails", NEW ALWAYS NAILS CORP. d/b/a/ "Always is Nails", MAJOONGMOOL CORP. d/b/a "Always is Nails", J H DIVA NAIL & SPA INC. d/b/a "Diva Nails", VIVA NAILS & SPA, INC. d/b/a "Diva Nails", QIXING LI a/k/a "John Lee", GUINING CUI a/k/a "Susan Lee," and YING AI CHE a/k/a "Cha Young He",

Defendants.

08-CV-3469 (TCP)(WDW)

**STIPULATION OF  
VOLUNTARY DISMISSAL  
AS TO CERTAIN  
DEFENDANTS ONLY**

IT IS HEREBY STIPULATED AND AGREED, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, by and among the undersigned counsel of record and party, representing all parties who have appeared in the action, being fully authorized to enter this Stipulation of Voluntary Dismissal as To Certain Defendants Only, that:

1. All claims asserted by plaintiffs Siew V. Thong, Yue F. Xia, and Qiao F. Chen (together, "Plaintiffs") against defendant Ying Ai Che in the Second Amended Complaint shall be dismissed with prejudice and without costs to either party as against the other.

2. Counts VIII, X, XII, and XIV asserted by Plaintiffs against defendant Majongmool Corp. shall be dismissed with prejudice and without costs to either party as against the other.

3. Counts VIII, X, XI, and XIII asserted by Plaintiffs against defendant Viva Nails & Spa, Inc. in the Second Amended Complaint shall be dismissed with prejudice and without costs to either party as against the other.

4. Counts VIII, IX, X, XI, XII, and XIII asserted by Plaintiffs against defendant Guining Cui in the Second Amended Complaint shall be dismissed with prejudice and without costs to either party as against the other.

5. Count IX asserted by plaintiff Yue F. Xia against defendants Majoongmool Corp., Viva Nails & Spa, Inc., and Guining Cui in the Second Amended Complaint shall be dismissed with prejudice and without costs to either party as against the other.

6. All counterclaims asserted by defendant and counterclaim-plaintiff Ying Ai Che against Plaintiffs in the Answer to Claims of Defendant Ying Ai Che shall be dismissed with prejudice and without costs to either party as against the other.

7. All crossclaims asserted by defendant and crossclaim-plaintiff Ying Ai Che against defendants Majoongmool Corp., Viva Nails & Spa, Inc., and Guining Cui a/k/a "Susan Lee" in the Answer to Claims of Defendant Ying Ai Che shall be dismissed with prejudice and without costs to either party as against the other.

8. This stipulation shall not affect any claims against any defendant not a party to this stipulation.

9. This stipulation may be executed in counterparts, each of which shall be deemed an original but all of which constitute one and the same agreement.

10. Facsimile or electronically transmitted signatures shall have the same force and effect as originals.

Dated: New York, New York  
, 2013

**COVINGTON & BURLING LLP**

By: \_\_\_\_\_  
Colin P. Watson

The New York Times Building  
620 Eighth Avenue  
New York, New York 10018-1405  
Phone: 212.841.1000  
cpwatson@cov.com

David A. Colodny  
URBAN JUSTICE CENTER  
123 William Street, 16th Floor  
New York, New York 10038  
Phone: 646.602.5600  
dcolandny@urbanjustice.com

*Attorneys for Plaintiffs*

Dated: New York, New York  
, 2013

**MICHAEL D. YIM, ESQ.**

\_\_\_\_\_  
c/o Lee Anav Chung LLP

156 Fifth Avenue, Suite 303  
New York, New York 10010

*Attorney for Defendants Majoongmool Corp.  
d/b/a "Always is Nails," Viva Nails & Spa, Inc.  
d/b/a "Diva Nails," and Guining Cui a/k/a  
"Susan Lee"*

Dated: Glen Head, New York  
, 2013

**YING AI CHE**

\_\_\_\_\_  
240 Glen Head Road  
Glen Head, New York 11545

TO: MICHAEL D. YIM, ESQ.  
c/o Lee Anav Chung LLP  
156 Fifth Avenue, Suite 303  
New York, NY 10010  
*Attorney for Defendants Majoongmool Corp., Viva Nails & Spa, Inc., and Susan Lee*

THE LAW OFFICES OF DIANE H. LEE  
2460 Lemoine Avenue  
Suite 402  
Fort Lee, NJ 07024

*Attorneys for Defendants Majoongmoor Corp., Viva Nails & Spa, Inc., and Susan Lee*

YING AI CHE  
240 Glen Head Road  
Glen Head, NY 11545

LOVELY NAILS NY, INC.  
744 Old Bethpage Road  
Old Bethpage, NY 11804

J.H. DIVA NAILS & SPA, INC.  
240 Glen Head Road  
Glen Head, NY 11545

NEW ALWAYS NAILS CORP.  
744 Old Bethpage Road  
Old Bethpage, NY 11804

QIXING LI a/k/a JOHN LEE  
36-20 Bowne Street, Apt. 5F  
Flushing, NY 11354